

Exhibit B

(Without attachment)

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Via Email: rodneyolivermusic@gmail.com

Mr. Rodney David Oliver
11074 Oso Avenue
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Via Email: cooleyjoe011@gmail.com

Mr. Joe Cooley
248 E 157th Street
Gardena, CA 90248

Re: The Barry White Family Trust U/A/D: December 19, 1980, By its Duly
Empowered Trustees v. Cooley et al. Case No. 24-cv-07509-DLC

Dear Mr. Oliver and Mr. Cooley:

On June 25, 2025, we wrote in connection with the deficiencies in connection with your written responses. We attach that correspondence. We also asked when your documents would be produced. To date, we have received no response. Please advise what times on July 9 or July 10, 2025 you are available for a meet and confer.

This letter is written with a full reservation of our client's rights and remedies, all of which are hereby expressly reserved.

Very truly yours,

HERBSMAN HAFER WEBER
& FRISCH, LLP


Dorothy M. Weber, Esq.